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BEFORE THE ARIZONA CORPORATION COMPHS SIGN Commission

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CARL J. KUNASEK Chairman

JIM IRVIN

Commissioner
WILLIAM A. MUNDELL

Commissioner

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IN THE MATTER OF INVESTIGATION OF U S WEST COMMUNICAITONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS.

DOCKET NO. T-00000A-00-0194

MOTION OF THE COMMISSION STAFF TO SUPPLEMENT THE RECORD

The Arizona Corporation Commission ("Commission" or "ACC") Staff hereby requests an Order by the Hearing Officer directing U S WEST Communications, Inc. ("U S WEST") to supplement the record in this case with three additional exhibits. Staff believes that this additional information would be useful to the Hearing Officer and the parties in further evaluating the various proposals in this case. Since all of this information should be readily available to the Company, Staff requests that the Company be directed to provide it by Thursday of this week so parties can consider the information in their briefs.

Staff believes the following additional information is necessary for a proper evaluation of the Company's case. First, Staff would like to see the Loop Mod's breakdown of average loop costs by wirecenter. It was Staff's understanding that U S WEST Witness Million indicated at the hearing that such information was available. Second, the Company should be directed to supply the workpapers from the Loop Mod showing the aggregation of loop costs per wire center grouping (very small, small, medium and large). Finally, the Company should supply the breakdown of lines per individual wire center falling within the BRA and each of the two Zones. Staff believes that this information is important to determine the overall reasonableness of the Company's proposal, even on an interim basis.

Staff believes that this information should be readily available and will be useful to the Hearing Officer and other parties. Given the expedited timeframe for Phase I of this proceeding,

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believes that good cause exists for granting its Motion. Staff respectfully requests that an expedited 3 procedural conference be scheduled to discuss its Motion. RESPECTFULLY submitted this 16th day of May, 2000. Maureen A. Scott Attorney, Legal Division 1200 West Washington Street 9 Phoenix, Arizona 85007 Telephone: (602) 542-6022 10 Facsimile: (602) 542-4870 e-mail: maureenscott@cc.state.az.us 11 THE ORIGINAL AND TEN COPIES of the foregoing filed this 16th day of 12 May, 2000 with: 13 Docket Control 14 Arizona Corporation Commission 1200 West Washington Street 15 Phoenix, Arizona 85007 16 COPIES of the foregoing mailed 17 this 16th day of May, 2000 to: 18 Richard S. Wolters AT&T 19 1875 Lawrence Street, Room 1575 Denver, CO 80202-1847

Tom Dethlefs

U S WEST COMMUNICATIONS, INC. 1801 California Street, Suite 5100

Denver, CO 80202

22 23

Michael W. Patten **BROWN & BAIN** 24 P.O. Box 400

Phoenix, AZ 85001-0400

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Michael Grant 26 Todd C. Wiley

GALLAGHER & KENNEDY

27 2575 E. Camelback Road Phoenix, AZ 85016-9225 28

and the availability of only one week between the filing of direct and responsive testimony, Staff

1	
2	Thomas H. Campbell
3	LEWIS & ROCA 40 N. Central Avenue Phoenix, AZ 85007
. 4	
5	Thomas F. Dixon, Jr. MCI WORLDCOM 707 17 th Street
6	Denver, CO 80202
7	Darren S. Weingard
8	Stephen H. Kukta SPRINT COMMUNICATIONS CO.
9	1850 Gateway Drive, 7 th Floor San Mateo, CA 94404-2467
10	Scott S. Wakefield
11	RUCO 2828 N. Central Avenue, Suite 1200
12	Phoenix, AZ 85004
13	Lyn Farmer, Chief Counsel LEGAL DIVISION
14	1200 W. Washington Street Phoenix, AZ 85007
15	Deborah Scott, Director
16	UTILITIES DIVISION 1200 W. Washington Street
17	Phoenix, AZ 85007
18	Timothy Peters
19	Electric Lightwave, Inc. 4400 NE 77 th Avenue
20	Vancouver, WA 98668
21	Douglas Hsiao Rhythms Links, Inc.
22	6933 S. Revere Pkwy. Englewood, CO 80112
23	Ms. Penny Bewick
24	New Edge Networks P.O. Box 5159
25	3000 Columbia House Blvd. Vancouver, WA 98668
26	Elizabeth Howland, National Director
27	Regulatory and Interconnection ALLEGIANCE TELECOM OF ARIZONA, INC.
28	1950 Stemmons Freeway, Suite 3026 Dallas, TX 75207-3118

Clay Deanhardt, Esq. Covad Communications 4250 Burton Street Santa Clara, CA 95054

Lisa R. Pearce